

IN RE:	§	
	§	
WALTER GEORGE BUSBY	§	CASE NO. 19-50725-cag
DEANN LOUISE BUSBY	§	CHAPTER 7
Debtor(s)	§	
	§	
	§	
WILMINGTON TRUST COMPANY,	§	
AS SUCCESSOR TRUSTEE TO	§	
CITIBANK, NA AS TRUSTEE TO	§	
STRUCTURED ASSET SECURITIES	§	
CORPORATION, SERIES 2005-1	§	
Movant,	§	
v.	§	
	§	
WALTER GEORGE BUSBY, Debtor	§	
DEANN LOUISE BUSBY, Debtor	§	
JOSE C RODRIGUEZ, Trustee	§	
Respondents	§	

TO THE HONORABLE JUDGE OF SAID COURT:

ARGUMENTS

Walter George Busby and Deann Louise Busby represents the following in relation to ECF #12, Wilmington Trust Company's (WILMINGTON) Motion for Relief from the Automatic Stay:

1. Paragraph 1 of WILMINGTON's Motion does not require an admission or denial because it merely recites statutory predicate.

2. Respondents admits all facts stated in paragraph 2 of WILMINGTON's Motion for Relief from the Automatic Stay.

3. Respondents admits all facts stated in paragraph 3 of WILMINGTON's Motion for Relief from the Automatic Stay.

4. Respondents admits all assertions stated in paragraph 4 of WILMINGTON's Motion for Relief from the Automatic Stay.

5. Respondents admits all facts stated in paragraph 5 of WILMINGTON's Motion for Relief from the Automatic Stay except Respondent cannot admit or deny the exact number of missed payments.

6. Respondents cannot admit or deny the state of mind of Movant as stated in Paragraph 6 of WILMINGTON's Motion for Relief from the Automatic Stay.

7. Respondents cannot admit or deny the facts stated in Paragraph 7 of WILMINGTON's Motion for Relief from the Automatic Stay.

8. Respondents admits all assertions stated in paragraph 8 of WILMINGTON's Motion for Relief from the Automatic Stay.

9. Respondents admits all assertions stated in paragraph 9 of WILMINGTON's Motion for Relief from the Automatic Stay.

10. Respondents denies all assertions stated in paragraph 10 of WILMINGTON's Motion for Relief from the Automatic Stay.

11. In response to paragraph 11 of WILMINGTON's Motion for Relief from the Automatic Stay Respondent pleads the Movant is over secured and adequately protected and, therefore, the motion for relief from the automatic stay should be denied.

12. In response to paragraph 12 of WILMINGTON's Motion for Relief from the Automatic Stay Respondent pleads the Movant is over secured and adequately protected and, therefore, the relief requested in paragraph 12 should be denied.

WHEREFORE, PREMISES CONSIDERED, the Respondents pray the Court DENY WILMINGTON's Motion for Relief from the Automatic Stay and grant to Respondents any such relief as the Debtor may be entitled to.

Dated: May 23, 2019

Respectfully Submitted,

By: /s/ Ronald J. Smeberg

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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2019, a copy of the forgoing was served electronically through the Court's ECF system or by regular United States mail to all interested parties and all creditors listed below.

/s/ Ronald Smeberg
Ronald J. Smeberg

SERVICE LIST

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